

1 THOMAS E. MOSS
2 UNITED STATES ATTORNEY
3 JAMES M. PETERS
4 ASSISTANT UNITED STATES ATTORNEY
5 DISTRICT OF IDAHO
6 MK PLAZA, PLAZA IV
7 800 PARK BOULEVARD, SUITE 600
8 BOISE, IDAHO 83712-9903
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U.S. Courts
Rec'd _____ Filed _____

OCT 14 2004

Cameron S. Burke
Clerk, Idaho

10 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 DALE ROBERT SALYERS,

15 Defendant.

Cr. No.

CR 04-0201-S-EJL

INFORMATION

[Vio. 18 U.S.C. §§ 922(g)(4) 924(d), 21
U.S.C. § 853 and 28 U.S.C. § 2461(e)]

16 **THE UNITED STATES ATTORNEY ALLEGES THAT:**

17 **COUNT ONE**

18 18 U.S.C. §922(g)(4)

19 On or about July 15, 2004, in the State and District of Idaho, the defendant, DALE
20 ROBERT SALYERS, having been committed to a mental institution on or about April 23, 2004
21 under an Order of Commitment in Canyon County, Idaho Case No. CV2004-03648, and having
22 been released from State Hospital North on or about July 7, 2004, did knowingly possess in and
23 affecting interstate and foreign commerce, a Taurus .357 Magnum pistol, serial number
24 ML880047, which had been shipped and transported in interstate and foreign commerce, in
25 violation of Title 18, United States Code, Section 922(g)(4).
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27

1 COUNT TWO

2 Forfeiture

3 18 U.S.C. § 924(d), 21 U.S.C. § 853 and 28 U.S.C. § 2461(c)


4 Upon conviction of the offense alleged in this Indictment, defendant DALE ROBERT
5 SALYERS, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. §
6 2461(c), all firearms and ammunition involved in the commission of the offense alleged in Count
7 One, that is, a Taurus .357 Magnum pistol, serial number ML880047.

8 If any of the above-described forfeitable property, as a result of any act or omission of the
9 defendant:

- 10 (a) cannot be located upon the exercise of due diligence;
11 (b) has been transferred or sold to, or deposited with, a third party;
12 (c) has been placed beyond the jurisdiction of the court;
13 (d) has been substantially diminished in value; or
14 (e) has been commingled with other property which cannot be divided without difficulty;
15 it is the intent of the United States, pursuant to 18 U.S.C. § 924(d) and 21 U.S.C. § 853 as
16 incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant(s)
17 up to the value of the forfeitable property described above.

18
19 Dated: 10-14-04

20 THOMAS E. MOSS
UNITED STATES ATTORNEY

21 
22 James M. Peters
Assistant United States Attorney
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CRIMINAL COVERSHEET

DEFENDANT'S NAME: Dale Robert Salyers

Juvenile: No

DEFENSE ATTORNEY: Randall S. Barnum
ADDRESS: 222 North 13th StreetService Type:
Non-Secret WarrantBoise, Idaho 83702
TELEPHONE NO.: (208) 336-9401Interpreter: No
If yes, language:

CR 04-0201-S-EJL

INVESTIGATING Ralph Lambright
AGENT & AGENCY: Bureau of Alcohol, Tobacco & Firearms
TELEPHONE NO.: (208) 334-1160

CASE INFORMATION: (List any miscellaneous, magistrate, CVB or other related defendants/case numbers).

THE DEFENDANT WILL PLEAD AT INITIAL APPEARANCE

CRIMINAL CHARGING INFORMATION

☐ Complaint ☐ Indictment ☒ Information ☐ Superseding Indictment
☒ Felony ☐ Class A Misdemeanor ☐ Class B or C Misdemeanor (Petty Offense)
County of Offense: Canyon Estimated Trial Time: 5 days

TITLE/SECTION	COUNT	BRIEF DESCRIPTION	PENALTIES (Include Supervised Release and Special Assessment)
18 U.S.C. § 922(g)(4)	1	Possession of firearm affecting interstate and foreign commerce	Incarceration for not more than 10 years and/or \$250,000 fine, \$100 special assessment, 3 years supervised release
28 U.S.C. § 2461	2	Forfeiture	Forfeiture

Date: October 14, 2004

AUSA: James M. Peters
Telephone No.: (208) 334-1211